

**REMARKS:**

**I. STATUS OF THE CLAIMS**

Claims 36-38 are cancelled without prejudice or disclaimer, and claims 1, 18, 35 and 36 are amended herein. No new matter has been added. Support for the amendments would be found in, for example, FIGS. 5-7; page 6, lines 20-26 and page 9, line 7 through page 10, line 25 of the specification of the present application.

Claims 1-38 are rejected.

In view of the above, it is respectfully submitted that claims 1-38 are currently pending in this application.

**II. REJECTION OF CLAIM 2 UNDER 35 U.S.C. § 112, SECOND PARAGRAPH**

The Examiner notes that there is insufficient antecedent basis for "said file management unit" in claim 18. Therefore, claim 18 is amended to correct this matter.

In view of the above, it is respectfully requested that the rejection be withdrawn.

**III. REJECTION OF CLAIMS 1 AND 35 UNDER 35 U.S.C. § 101 AS BEING DIRECTED TO NON-STATUTORY SUBJECT MATTER**

In items 4-5 on pages 2-3 of the Office Action, the Examiner asserts that claims 1 and 35 are "directed to non-statutory subject matter". Therefore, claims 1 and 35 are amended to clarify this matter. Based on the Examiner's comments found in lines 3-5 on page 3 of the current Office Action and the corresponding Applicant's amendments in claims 1 and 35, it is respectfully submitted that the rejection is overcome.

In view of the above, it is respectfully requested that the rejection be withdrawn.

**IV. REJECTION OF CLAIMS 1-6, 8-12, 14, 15, 17-23, 25-29, 31, 32, 34 AND 35 UNDER 35 U.S.C. § 103(a) AS BEING UNPATENTABLE OVER CHUNG ET AL (U.S. PATENT 6,105,148) IN VIEW OF PRUST (U.S. PATENT 6,714,968), AND FURTHER IN VIEW OF SUBRAMANIAN (U.S. PATENT 6,574,631)**

Claim 1 specifically recites an "extended meta data correlating the file managed in said data area and said user defined process held in said defined process holding unit".

(Emphasis added). Claims 18 and 35 recite somewhat similar features. It is respectfully submitted that Chung, Prust and Subramanian, either singularly or in combination, fail to disclose, teach or suggest these features.

On page 4, lines 13-14 of the current Office Action, the Examiner concedes that Chung fails to "teach the managing of files, the use of meta data ...". Further, on page 5, line 13, the Examiner concedes that Prust fails to teach the use of extended meta data. However, it appears that the Examiner believes that the extended meta data in Subramanian corresponds to an **"extended meta data correlating the file managed in said data area and said user defined process held in said defined process holding unit"** as explicitly recited by Applicant in, for example, claim 1. However, a review of the sections cited by the Examiner, and a complete review of Subramanian reveals that Subramanian fails to disclose, teach or suggest an **"extended meta data correlating the file managed in said data area and said user defined process held in said defined process holding unit"**.

Instead, Subramanian relates to methods and systems for extending schema objects such as tables in a database without modifying the application source code that accesses the tables. See, for example, column 1, lines 12-16 of Subramanian. Subramanian addresses performance issues by pre-fetching all base attributes, extended attribute(s) and metadata for each accessed row in the base table 510 and storing (caching) the pre-fetched information in a predetermined area of memory designated for that purpose. See, for example, column 8, lines 61-66 of Subramanian. In this manner, all of the information corresponding to the accessed row in the base table may be quickly and locally available to the accessing application. See, for example, column 8, line 66 through column 9, line 2 of Subramanian.

However, it is respectfully submitted that Subramanian fails to disclose, teach or suggest an **"extended meta data correlating the file managed in said data area and said user defined process held in said defined process holding unit"**, as specifically recited by Applicant in, for example, claim 1. Instead, Subramanian merely addresses performance issues by **pre-fetching** all base attributes, extended attribute(s) and metadata. See, for example, column 8, lines 61-66 of Subramanian. Therefore, it is respectfully submitted that Chung, Prust and Subramanian, either singularly or in combination, fail to disclose, teach or suggest the features of an extended meta data correlating the file managed in said data area and said user defined process held in said defined process holding unit, as specifically recited by Applicant in, for example, claim 1. Further understanding and appreciation for Applicant's claimed invention as recited in claim 1, for example, would be found in, for example, FIGS. 5-7, and pages 9-10 of the specification of the present application.

Further to the reasoning presented above, it is respectfully submitted that the present claimed invention makes it possible to execute a user defined process using the access to the file as a trigger, without depending upon the application, by using an extended metadata for correlating the file managed in the data area with the user defined process held in the user defined process holding unit, thereby permitting more flexible data control and improvement of performance. It is respectfully submitted that none of the combinations of Chung and any of the cited references provide a file system that discloses or suggests this operation. In other words, the combinations cited by the Examiner do not make it possible to execute a user defined process using the access to the file as a trigger, without depending upon application, by using an extended metadata for correlating the file managed in the data area with the user applied process held in the user defined process holding unit, as in the present invention. Therefore, it is respectfully submitted that the cited references do not disclose or suggest the present claimed invention.

In view of the above, it is respectfully submitted that the rejection is overcome.

Although the above comments are specifically directed to claim 1, it is respectfully submitted that the comments would be helpful in understanding differences in claims 2-35 over the cited references.

Further, in items 11-26 on pages 3-15 of the Office Action, claims 2-17 and 19-34 were rejected as unpatentable over the combinations of Chung, Prust and Subramanian with various combinations of U.S. Patent 5,537,592 to King et al; U.S. Patent 6,564,232 to Cole et al; U.S. Patent 6,542,909 to Tamer et al; and U.S. Patent 6,356,904 to Moriyama. Nothing was cited or has been found in any of these additional references suggesting modification of the combinations of Chung, Prust and Subramanian, to overcome the deficiencies discussed above. Since claims 2-17 and 19-34 depend from claims 1 and 18, it is respectfully submitted that claims 2-17 and 19-34 patentably distinguish over the combinations of Chung, Prust and Subramanian for the reasons discussed above with respect to claims 1 and 18.

**V. REJECTION OF CLAIMS 36-38 UNDER 35 U.S.C. § 103(a) AS BEING UNPATENTABLE OVER GARTNER (U.S. PATENT 6,393,435) IN VIEW OF KATADA ET AL (U.S. PATENT 5,619,691)**

Claims 36-38 are cancelled without prejudice or disclaimer.

**VI. CONCLUSION**

There being no further outstanding objections or rejections, it is respectfully submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: 06/14/06

By: Thomas L. Jones  
Thomas L. Jones  
Registration No. 53,908

1201 New York Avenue, NW, 7th Floor  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501